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**MEMO ENDORSED**

April 3, 2012

**VIA FACSIMILE**

The Honorable Harold Baer, Jr.  
U.S. District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Suite 2230  
New York, NY 10007-1312  
Facsimile: (212) 805-7901

The Honorable Kimba M. Wood  
U.S. District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Suite 1901  
New York, NY 10007-1312  
Facsimile: (212) 805-7900

Re: U.S. v. Carollo, et al., No. 10 Cr. 654 (HB)  
U.S. v. Ghavami, et al., No. 10 Cr. 1217 (KMW)

Dear Judges Baer and Wood:

On Friday, March 30, 2012, this Court granted Third-Party Movants Investment Management Advisory Group, Inc. ("IMAGE"), David Eckhart, and Martin J. Stallone (collectively, "the IMAGE Movants") permission to file a four-page sur-reply to the Government's Application for an Order Resolving Claims of Attorney-Client Privilege or Attorney Work Product as to Consensual Recordings ("the Government's Application"). See *United States v. Carollo*, 10-CR-00654 (HB), Doc. 213 (filed Mar. 30, 2012). The IMAGE Movants write to request permission to file this sur-reply under seal in the above-referenced cases, consistent with this Court's February 1, 2012 Order. See *United States v. Ghavami*, 10-CR-01217 (KMW), Doc. 88 (filed Feb. 2, 2012) (granting the IMAGE Movants permission to file their reply to the Government Application under seal).

Granted.  
KMW

4-3-12

**SO ORDERED, N.Y., N.Y.**

*Kimba M. Wood*  
**KIMBA M. WOOD**  
**U.S.D.J.**

Respectfully submitted,

*Lathrop B. Nelson*  
LBN/CCD

Lathrop B. Nelson, III

cc: All counsel of record in the above-captioned cases (via email)

**MONTGOMERY MCCracken WALKER & Rhoads LLP**  
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